

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re the Application for NATALIA
POTANINA for an Order to Take
Discovery Pursuant to 28 U.S.C. § 1782(a)

No. 14-MC-50276 (VAR)
Hon. Victoria A. Roberts
Magistrate R. Steven Whalen

**BRIEF IN SUPPORT OF THE COURT'S APPROVAL AND ENTRY OF
COSMOPOLITAN TRAVEL & TOURS INC.'S AND NIKOLAI
ATANASSOV'S PROPOSED PROTECTIVE AND CONFIDENTIALITY
ORDER**

INDEX OF EXHIBITS

- A. Cosmopolitan Travel & Tours Inc.'s and Nikolai Atanassov's Proposed Protective and Confidentiality Order (clean copy)
- B. Cosmopolitan Travel & Tours Inc.'s and Nikolai Atanassov's Proposed Protective and Confidentiality Order (redlined copy)
- C. Consulting Expert Undertaking contained in Default Protective Order in Eastern District of Michigan